

ORIGINAL

JTF  
dm

June 10, 2004

**By Hand**

The Hon. Frederic Block  
United States District Court  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Joint Letter from Counsel**  
***In re Holocaust Victim Assets Litigation, 04-CV-01786 (FB)***

Dear Judge Block,

As counsel for the Settling Plaintiffs and Settling Defendants, we are pleased to inform you that we have amicably resolved all pending issues by agreeing on a series of steps that are expected to improve and expedite the functioning of the Deposited Assets claims process and, at the same time, bring closure to certain questions. These steps are specifically set forth in Memorandum to File that we have executed and ask the Court to endorse.

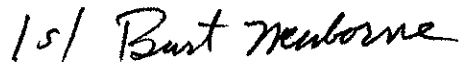
As reflected in the Memorandum to File, we have agreed that both sides have acted in good faith in connection with the implementation of the Settlement Agreement and that all parties have fulfilled their commitments as set forth in the Settlement Agreement, as amended. In addition, we have:

- Agreed on procedures that will enable the CRT II to perform certain functions in New York City in a way that should expedite its work and at the same time conform to the Settlement Agreement and Swiss law.
- Agreed on the publication or republication on the internet of certain accounts previously identified by the ICEP and the Swiss Government respectively, again, in a way that should improve the accountability of the claims process and that is consistent with ICEP findings, Swiss law, and the Settlement.
- Agreed on procedures for certain research steps to be taken that involve Total Account Databases that should improve the accountability of the claims distribution process while at the same time respecting ICEP findings, Swiss law, and the Settlement Agreement.
- Agreed that the Swiss banks are entitled to finality and that the measures set forth in the Memorandum to File resolve all open issues and bring the desired finality.

Furthermore, we have also agreed on a Proposed Confidentiality Order, which will establish clear rules to protect the confidentiality of bank customers while allowing the CRT II to expedite its work. We respectfully ask the Court to endorse this Order, which is attached.

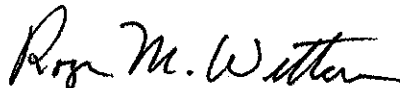
As reflected in the Memorandum to File, it will become effective when endorsed by the Court and when relevant Swiss governmental authorities have approved. We hope to secure the approval of both authorities promptly. In light of that, we would respectfully ask to schedule a joint meeting with Your Honor in chambers, at the Court's earliest convenience, so that we can explain the agreement more fully and answer any questions Your Honor may have about the agreement.

Respectfully submitted,

Handwritten signature of Burt Neuborne in cursive script.

Burt Neuborne  
New York University Law School  
40 Washington Square South  
New York, NY 10012

*Settlement Counsel for Plaintiff Class*

Handwritten signature of Roger M. Witten in cursive script.

Roger M. Witten  
Wilmer Cutler Pickering Hale and Dorr LLP  
399 Park Avenue  
New York, NY 10022

*Counsel for UBS AG and Credit Suisse Group*